

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

Priorities USA, Rise, Inc., and the
Detroit/Downriver Chapter of the A.
Philip Randolph Institute,

Plaintiffs,

v.

Dana Nessel, in her official capacity as
Attorney General of the State of
Michigan,

Defendant,

and

Republican National Committee,
Michigan Republican Party, Michigan
House of Representatives, and
Michigan Senate,

Intervenor-Defendants.

NO. 19-13341

JUDGE STEPHANIE DAWKINS
DAVIS

MAGISTRATE
JUDGE KIMBERLY G.
ALTMAN

STIPULATED MOTION TO EXTEND DEADLINES

The undersigned counsel for Plaintiffs, Defendants, and the Intervenor-Defendants (the “Parties”) hereby stipulate to an extension of the discovery deadlines set by the Court’s September 3, 2021 Case Management Order. ECF No. 110.

As grounds for this motion, the Parties state the following in support of modifying the existing deadlines:

1. The Parties have been diligently pursuing discovery. Many of the Parties have served and responded to document requests and interrogatories.

2. The Attorney General and Secretary of State have been unable to complete their document production due to technical difficulties. The Attorney General and Secretary of State are working toward producing responsive documents. The Republican Committees have made significant progress in collecting, processing, and reviewing a voluminous number of potentially responsive documents for production, but require additional time to complete their review. Plaintiffs and the Republican Committees are working to develop a final production schedule that will occur after November 12, 2021. The Parties respectfully submit that these “unusual circumstances,” ECF. No. 110, PageID. 1873, necessitate a limited extension of the deadlines in this litigation.

3. The extensions of the deadlines as outlined below are necessary to allow the Attorney General, the Republican Committees, and the non-party Secretary of State sufficient time to complete document production. The extension of the deadlines as outlined below are also necessary to allow Plaintiffs to review these document productions prior to taking depositions of relevant witnesses.

4. The Parties note that the extension of deadlines herein seeks to extend the deadline for Attorney General and Secretary of State document productions to December 3, 2021.

5. The Republican Committees need until about November 15, 2021, to receive information from their ediscovery vendor before a firm production date can be determined. Plaintiffs and the Republican Committees will work cooperatively to develop a production date once the information becomes available. If they are unable to reach agreement, they will bring the matter to the Court under Paragraph E of the CMO.

6. The Plaintiffs intend to expeditiously review documents once produced by the Attorney General, the Republican Committees, and the Secretary of State and to take depositions of relevant witnesses on or prior to December 10, 2021. The fact discovery cut off for other parties remains the same (November 12, 2021).

7. The Parties note that the extension of deadlines herein seeks to reduce the timeframe for expert witness depositions.

8. The Parties note that the extension of deadlines herein seeks to extend the deadline to submit dispositive motions from February 21, 2021 to March 5, 2022. Accordingly, the extended deadlines sought herein will provide the Parties necessary time to complete discovery prior to submitting dispositive motions.

9. As required by R12 of the Eastern District of Michigan's Electronic Filing Policies and Procedures, the Parties include a Proposed Order with this filing.

| EVENT | CURRENT DEADLINE | STIPULATED DEADLINE |
|--|-------------------------------|-------------------------------|
| Initial Witness List | October 4, 2021 | |
| Final Witness List | November 4, 2021 | |
| Fact Discovery Deadline (Excepting Attorney General, the Republican Committees, and Secretary of State Productions/Witness Depositions) | November 12, 2021 | |
| Deadline for Attorney General and Secretary of State Document Productions | November 12, 2021 | December 3, 2021 |
| Deadline to Depose Attorney General and Secretary of State Witnesses | November 12, 2021 | December 10, 2021 |
| Plaintiffs' Expert Report(s) | Wednesday, November 17, 2021 | Friday, December 17, 2021 |
| Defendants' Expert Report(s) | Friday, December 17, 2021 | Friday, January 14, 2022 |
| Plaintiffs' Rebuttal Expert Report(s) | Friday, January 7, 2022 | Friday, January 28, 2022 |
| Expert Witness Depositions | January 10 - January 21, 2022 | January 31 – February 4, 2022 |
| Close of Discovery | Friday, January 21, 2022 | Friday, February 4, 2022 |
| Daubert Motions | Monday, February 21, 2022 | Friday, March 5, 2022 |
| Dispositive Motions | Monday, February 21, 2022 | Friday, March 5, 2022 |

Respectfully submitted,

Dated: November 16, 2021

s/ Jyoti Jasrasaria

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Counsel for Plaintiffs

Dated: November 16, 2021

s/ Heather S. Meingast

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Dated: November 16, 2021

s/ Susan M. McKeever

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Dated: November 16, 2021

s/ Kurtis T. Wilder

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EASTERN DISTRICT OF MICHIGAN**

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NO. 19-13341

JUDGE STEPHANIE DAWKINS
DAVIS

MAGISTRATE
JUDGE KIMBERLY G.
ALTMAN

ORDER

In consideration of the Parties' Stipulated Motion to Extend Deadlines, the Court hereby amends its Case Management Order of September 3, 2021 and orders that the following schedule will govern the future course of this case.

| EVENT | CURRENT DEADLINE | STIPULATED DEADLINE |
|--|-------------------------------|-------------------------------|
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IT IS SO ORDERED.

Date: November 19, 2021

s/Stephanie Dawkins Davis
Stephanie Dawkins Davis
United States District Judge